REMARKS

At first, Applicant appreciates that the Examiner and his supervisor had a personal interview with Applicant's representative on February 23, 2005. During the interview, the proposed amendments to the claims substantially as the presently submitted claims and the primary reference Kloba et al. (U.S. Patent 6,779,042) were discussed. Applicant's representative pointed out numerous major differences between the embodiments of the present invention as amended and the Kloba reference. The Examiner indicated that the proposed amendment would overcome the Kloba reference and the application will be reconsidered upon a further search.

In this Amendment, Applicant has cancelled Claims 2 – 5 and 19, amended Claims 1 and 6 – 18, and added new Claim 21. Claims 2 – 5 and 19 have been cancelled without prejudice or disclaimer. Claim 1 has been amended to overcome the rejection and further specify the embodiments of the present invention. Claims 6 – 18 have been amended to proper dependent form. In addition, Claims 1, 6, 7, 12 and 15 – 18 have been amended to delete reference numerals. The support for the amendments to the claims can be found throughout the specification. It is respectfully submitted that no new matter has been introduced by the amended claims and specification. All claims are now present for examination and favorable reconsideration is respectfully requested in view of the preceding amendments and the following comments.

REJECTIONS UNDER 35 U.S.C. § 102 (e):

Claims 1 – 20 have been rejected under 35 U.S.C. § 102 (e) as allegedly being anticipated by Kloba et al. (U.S. Patent 6,779,042), hereinafter Kloba.

Applicant traverses the rejection and respectfully submits that the present-claimed invention is not anticipated by the cited reference. More specifically, Claims 2 – 5 and 19 have been cancelled. The rejection to these claims is moot. In addition, Claim 1 has been amended to further specify the embodiments of the present invention and defines

that the e-business mobility platform comprises "a request handler interface for communicating with a user device to receive a request for content and for downloading the content to the requesting user device in a format suitable for the user device; a content interface for communicating with a content server to retrieve requested content; a transformation engine for dynamically transforming content received from the content server in real time to a suitable format for the user device, and for routing the transformed content to the request handler interface for download to the requesting user device to complete a transaction initiated by the request for content, the transformation engine performing said transformation according to:- intention tags which are in the content and which capture non-presentation properties of the content as intended by an author, including indicating relationships between blocks of content to be preserved in the transformed content, task tags which are in the content and which indicate blocks of the content which are optional or alternative for user device types, and presentation tags indicating content presentation attributes; and the transformation engine converts the content to a document object model (DOM) in which nodes correspond to document tags, and transforms the document object model by parsing tags indicating blocks of content and deciding on transformation on a block-by-block basis according to the task and intention tags." The support for these amendments can be found throughout the specification, for example, in original Claims 1 – 5, page 10, line 5 to page 12, line 6 of the specification. In addition, newly added Claim 21 recites additional features of the transformation engine. The basis for the additional features can be found in page 6 lines 19-25, page 10 lines 5-20, and page 12 lines 22-30 of the specification. Claims 6 – 18 and 20 also include these features due to their dependency on Claim 1.

The various differences between the embodiments of the present invention as amended and the disclosure of the Kloba reference are explained below.

The invention as defined in Claim 1 includes several advantageous features for providing suitable content to a user device in real time in response to a request. The platform performs a complete transaction in response to a user device content request. The transformation automatically takes into account the author's intentions including grouping of content blocks and inclusion/exclusion of blocks. This allows a wide variety

of content to be developed in a device-independent manner while still achieving a device-specific download. The DOM features allow highly efficient transformation, on a tag or node basis. This has synergy with the task and intentions tags, as these tags also relate to content under them in the hierarchical source document structure, and hence are processed in a highly efficient manner by using a DOM. The invention enables an author to create content using a single device-neutral language and thereby facilitates the adaptation of said content so that it will be acceptable to any device requesting the content on behalf of a user, together with the kinds of service that can exploit this capability.

The present invention includes the dynamic transformation engine that consumes the device-neutral content (including the author's intention and task tags) to produce an output form that is acceptable to the requesting device. This does not necessitate knowledge of the state of the device or of any resources that may be stored by the device. In fact, only the general attributes of the identified device are necessary for the transformation to successfully produce acceptable content. In addition, the prior art does not disclose or suggest the inclusion of author intention and task tags. It is an approach that takes a different direction from that of skilled artisan at the time of the present invention, which concentrates entirely on user device attributes to achieve transformation.

The task and intention tags are expressly for the purpose of capturing the author's intentions and any tasks the author would wish to be performed while the content is being transformed for devices types. For example, with the intention tags the author is able to express an intention for keeping different pieces of content together. Such an intention can be satisfied by a transformation that either keeps the marked content in close proximity on the resulting page, or where necessary because of the lack of space, provides a navigation mechanism to enable the related pieces of content to be found easily.

To the contrary, the main focus of the Kloba reference is to synchronise content and data stored on a device with similar content and data stored on the server, so that the client can access the cached information <u>later</u> while not connected to the server, together

with the kinds of service that can exploit this capability. The tags described by Kloba have a programmatic focus, and the examples and illustrations suggest that their purpose is to shrink or otherwise reduce the content to fit a client. There is no any disclosure or suggestion of tags of representing author intentions or tasks, in addition to presentation tags. Kloba, as indicated in the abstract, provides means for loading/caching content onto a device that can be accessed interactively at a later time when the device is not connected to the server. This is completely different from the real time request / retrieval / transform / download transaction session of the amended Claim 1.

Regarding Examiner's rejection to original Claim 2, it is apparent that Kloba is referring to hyperlinks. A hyperlink can be "followed" in the manner described in column 28, lines 58-59 of Kloba. The intension tags in amended Claim 1 refer to a relationship between two or more blocks of the requested content. Furthermore, the citation references "tags as previously described" (Kloba, col. 28, line 56). Looking to the tags previously described, and the context in which they are employed, it is evident that these previously-described tags are provided for, and processed by, the client (as clarified in the sentence: "Content surrounded by this tag is ignored by client 108", Kloba, col. 28, lines 37-38). It is made clear in Claim 1 that the tags are provided for and processed by the transformation engine in the platform.

Regarding Examiner's rejection to original Claim 3, in Kloba it is the tags themselves that are optional. They may, or may not, be present. In amended Claim 1, it is the information contained or referenced by the tags that may be optional. Their operation depends on the server having knowledge of the "different interfacing capabilities".

Regarding Examiner's rejection to original Claim 4, Applicant respectfully submits that Kloba fails to teach or suggest the DOM features.

Regarding Examiner's rejection to original Claim 5, according to Kloba, it is the presence or absence of a tag within the page that determines how processing should proceed. By default, the scope of the tags is the entire Web page, but the scope may be restricted by the use of matching open/close tags (viz. the AGIGNORE tags). The

amended Claim 1 makes it clear that the invention includes the additional tags in the markup, and that these tags (which represent author intentions or tasks) determine the transformation of the DOM.

Regarding Examiner's rejection to Claim 6, the combination of DOMs is not the same as amassing a set of objects. The result of combining DOMs is a single DOM. In contrast, Kloba suggests that a collection of resources are amassed, and the examples of resources given by Kloba reinforces this view. The "integrity" of the information, as described by Kloba, refers to the set of resources referenced within the Web page, and the need to ensure that the client has all of these resources in order to display the Web page on the client device. Such integrity does not imply that the resources are combined into a unit, but rather remain as a collection. In the present invention, the combination of DOMs, is clear to a person of ordinary skill in the art that such a combination produces a single DOM, and is not the same as creating a collection.

Regarding Examiner's rejection to Claims 7 and 8, in the present invention, the user preferences are not merely exemplary of contextual information, but are specifically employed during the data processing (transformation) when they are available and pertinent to the transformation process. It is clear from the first two sentences of the citation that the terms "database" and "cache" are used synonymously. It is clear from the descriptions offered by Kloba that this "database" is actually a storage mechanism on the client. It is also clear that the purpose of this storage mechanism is to retain web pages and associated resources on the client device for access when the client device is not connected to the server. In Claim 8, the database is a collection of related information that can be searched via structured queries (in fact, a relational database), and is located on the server where it maintains preference information on a collection of users. It is not a cache of web pages on the client, nor is it a filing or content storage system.

Regarding Examiner's rejection to Claim 9, this is merely a misinterpretation of the word "provider". In claim 9, the "providers" are "for performing a transformation-related function". Thus the providers are processes, not the source of content as in the use of the word "provider" in Kloba. In the present invention, a provider is a piece of

software that implements a transformation function, and these providers can be connected in series in the server as a single transformation (see page 11, lines 2 – 5, page 13, lines 4 – 8, and page 24, lines 6 – 9 of the specification). In Kloba, a provider is a source of content, or an external server to whom one may send messages representing queries from the client, which in turn will return content representing the answers to the queries, as in the example offered by Kloba.

Regarding Examiner's rejection to Claim 10, the cache in Kloba refers to a client-side mechanism that stores complete web pages and associated resources (e.g. images) for access while offline. Claim 10 does not relate to client-side caching or browser caches. Claim 10 explicitly relates to a transformation mechanism, which is server-side. It furthermore clarifies that it is reusable intermediate data that is being cached. There is no disclosure in Kloba where intermediate data from transformations are cached on the server for later use as per Claim 10.

Regarding Examiner's rejection to Claim 11, it is respectfully submitted that in this context the term "provider" refers to a transformation mechanism in the server that is providing a transformation function, and Claim 1 indicates that a provider may cache part of the delivery context (i.e. the user preferences).

Regarding Examiner's rejection to Claim 12, there is disclosure in Kloba of accessers dedicated to a data type.

Regarding Examiner's rejection to Claim 13, in the present invention, the data types (of which "device" is only one type) are used to determine accessers, which in turn may access the (server-side) database for the purpose of obtaining data associated with values belonging to the various data types. Therefore, although Kloba does mention a data type, the use of the data types to determine accessers to the database is not disclosed in Kloba.

Regarding Examiner's rejection to Claim 14, while Kloba does disclose messaging, it is different from the requirement of Claim 14.

Regarding Examiner's rejection to Claim 15, the present invention is not concerned with synchronization of data between client and server, and the concept of "session" refers to an interactive sequence of requests and responses commencing with identification of the user and terminating with the user logging off. The present invention permits the user to change device mid-session, so that at one moment the user may be using a PDA and the next moment the user is using a phone, yet in both cases the user is interacting with the *same* session object in the server. The present invention can achieve this because it is only necessary to change a session parameter. It is clear from reading Kloba's description that the "session" in Kloba refers to one or more sync operations carried out in a contiguous sequence for the purpose of synchronizing a collection of data on the client with a similar collection of data on the server (an operation that might take place in a few seconds). The session in the present invention is a long-term sequence that might take place over minutes, hours or even days, and it does not involve synchronizing collections of data.

Regarding Examiner's rejection to Claims 16 and 17, it should be clear that the session manager of the present invention is a server mechanism, and any means that it has will therefore also be on the server. It should therefore also be clear that the present invention caches content *on the platform*. This is significantly different from Kloba insofar as the purpose of the Kloba invention is to maintain the client's cache of content. In contrast, the devices/browsers to which the content of the present invention is delivered have no requirement to possess such a cache. The purpose of the cache in the present invention is to hold transformed content in anticipation of the user making a request for such content. For example, if the result of a transformation is a sequence of pages, then the platform of the present invention must deliver the first page to the device and hold the rest of the pages in the server cache until the user requests them.

Regarding Examiner's rejection to Claim 18 and 20, Applicant respectfully submits that there is no disclosure or suggestion of the feature in Claims 18 and 20 ad explained above.

Therefore, the newly presented claims are not anticipated by Kloba and the rejection under 35 U.S.C. § 102 (e) and has been overcome. Accordingly, withdrawal of the rejection under 35 U.S.C. § 102 (e) is respectfully requested.

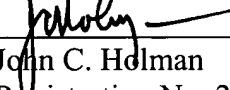INFORMATION DISCLOSURE STATEMENT:

Applicant respectfully submits that an Information Disclosure Statement was submitted on November 2, 2001, together with the Form PTO-1449 and relevant references. However, Applicant has not received the acknowledgement of the consideration of the Information Disclosure Statement and the returned Form PTO-1449 with Examiner's signature. Therefore, Applicant respectfully requests the Examiner to acknowledge the consideration of the Information Disclosure Statement and return the properly signed Form PTO-1449. Enclosed please find the copies of the previously filed Information Disclosure Statement, Form PTO-1449 and stamped postcard.

Having overcome all outstanding grounds of rejection, the application is now in condition for allowance, and prompt action toward that end is respectfully solicited.

Respectfully submitted,

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Enclosure:

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